

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ALEX GOLDFARB,

Plaintiff,

v.

CHANNEL ONE RUSSIA,

Defendant.

Case No. 1:18-cv-08128 (JPC)

**DECLARATION OF
LARISA A. NASONOVA**

DECLARATION OF LARISA A. NASONOVA

1. I, **Larisa A. Nasonova**, am the Head of the Human Resources Department of Joint Stock Company Channel One Russia ("Channel One"). I have personal knowledge of the facts set forth in this declaration. I would be competent to testify at trial to the information contained herein.

2. Although Russian is my native language, I am sufficiently proficient in reading and writing English such that I can provide this declaration in the English language.

3. The information detailed herein reflects the state of affairs in March 2018 and is also current.

4. I have served as the head of Human Resources since September, 2007.

5. Channel One is a company incorporated under the laws of Russia with its principal place of business in Moscow, Russia.

6. Channel One's operations structure is divided into various separate Directions (or Directorates), with examples including the Direction of Information Programs, the Direction of Special Projects, the Direction of Public and Political Broadcasting, and the Direction of Social and Publicistic Programs, Films Direction, Sports Direction.

7. These are formal separations. Each Direction is engaged in the production of programs in specific area of broadcasting, has its own independent manager who makes independent decisions regarding the composition and content of related programs, its own staff subordinated to the head of the Direction, its goals and rating tasks, different budgets, etc.

8. This formal separation serves the purpose of optimization of management structure, increasing the competitiveness of outgoing broadcasts and deep narrow professional qualifications of specialists, depending on the area of broadcasting.

9. The Direction of Information Programs is responsible for news reporting and news programming. This Direction employs approximately 800 people.

10. The Direction of Special Projects is responsible for entertainment programming including, for example, the show *Let Them Talk*. This Direction employs approximately 80 people.

11. Due to the separation among Directions, information obtained by the one (e.g., the Direction of Information Programs) is *not* shared with others (e.g., the Direction of Special Projects).

12. Likewise, due to the separation, cross-Direction communications regarding creative or programming material occur very rarely.

13. There is also no centralized repository (e.g., a database) where different Directions can search for or review material created or maintained by the others. Again, they do not share information.

14. In March 2018, Channel One employed two individuals—Zhanna Agalakova and Boris Leonov—physically located in New York. Ms. Agalakova was a reporter for Channel One and Mr. Leonov is a cameraman.

15. I am aware that Ms. Agalakova, of the Direction of Information Programs, conducted an interview of Dr. Alexander Goldfarb on March 23, 2018. My understanding is that the interview of Dr. Goldfarb had nothing to do with the separate programming of the shows *Let Them Talk* or *Man and Law*.

16. I am not aware that the interview (or even the fact of the interview) conducted by Ms. Agalakova was shared with the Direction of Special Projects and I otherwise have no reason to believe it was.

17. I am not aware that the interview (or even the fact of the interview) conducted by Ms. Agalakova was conveyed to Natalia Nikonova or Dmitry Borisov and I otherwise have no reason to believe it was.

18. Likewise, I am not aware that the interview (or even the fact of the interview) conducted by Ms. Agalakova was conveyed to Ostankino TV Company, Alexey Pimanov, or Elvira Shigapova and I otherwise have no reason to believe it was.

19. I have personally screened the tape of the interview of Dr. Goldfarb conducted by Ms. Agalakova. The interview lasted for approximately 30 minutes. Approximately 15 minutes of the interview discussed general issues relating to Russian foreign and domestic policy. Approximately 14 minutes of the interview discussed a report published in *BuzzFeed News* on June 15, 2017, discussing the death of fourteen individuals in Gratin Britain who had ties to Russians. Only 1 minute, 40 seconds of the interview discussed Dr. Goldfarb's role in the death of Alexander Litvinenko.

20. I am aware that Walter Litvinenko was invited to, and appeared on, the Channel One Program *Let Them Talk* in broadcasts dated March 20, 2018, April 4, 2018 and April 10, 2018.

21. In conjunction with his appearances, Walter Litvinenko entered into 3 agreements with Direkt LLC. Direkt is a company that provides technical services to JSC "Channel One Russia" during the filming of programs, including transportation, booking hotels for guests of programs. The agreement dated March 19, 2018, among other things, provided that he would be compensated the amount of 34,483 rubles and 00 kopeks. In U.S. dollars at a late March 2018 exchange rate, this was about \$603.

22. As far as I know he received no other remuneration but stipulated by these 3 agreements.

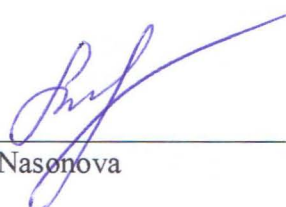
23. I have reviewed the agreements executed by Walter Litvinenko and they are consistent with standard agreements which any guests regularly sign on the programs.

24. Further, the receipt of a “fee,” such as that received by Walter Litvinenko, is standard. Indeed, guests are typically reimbursed for their time and costs for appearing on the program. As with others, this is why Walter Litvinenko was compensated.

25. In addition, the amount of this payment (34,843 Rubles) is not a large amount by the standard of the program *Let Them Talk*. Indeed, it is well within (and even at the lower end) of the range of what guests often receive in conjunction with their appearance.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 25, 2022
Moscow, Russia



Larisa Nasonova